



AIRTEK ENVIRONMENTAL CORP.

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November 8, 2005

Mr. Pat Evangelista
WTC Coordinator
New York City Response and Recovery Operations
USEPA Region II
290 Broadway
New York, NY 10007-1866

Re: 133-135 Greenwich Street & 21-23 Thames Street
Waste Characterization Sampling

Dear Mr. Evangelista,

This letter and its attachments are submitted per EPA's comment #1 on Submittal Part V dated October, 2005 for the above-referenced project.

Airtek believes that the laboratory used for analyses conducted in support of waste characterization at the site is appropriately accredited, and we have attached evidence of such accreditation. The laboratory certificates of analysis that were submitted within Part IV, Attachment A of the November 4 submittal state that procedures appropriate to each analysis conducted, including the laboratory QA/QC procedures specific to each analytical methodology were conducted in strict accordance with each methodology. The data is valid for waste disposal purposes.

Airtek has identified deficiencies with the initial sampling events by comparison to the QAPP. The deficiencies are detailed below, as are the response actions to be undertaken to correct the deficiencies immediately:

1. No co-located WTC Dust Sample.

Section 10.2.11 of the QAPP requires that a co-located dust sample be collected and analyzed as a check on laboratory accuracy and precision.

2. WTC Dust - 8-9-05 (Airtek #MP-01) (York ID 05080368-01)

Analyses of the WTC dust sample collected on 8/9/05 did not include the RCRA characteristics of Ignitability, Corrosivity and Reactivity. This sample was collected in the Kitchen of 133-135 Greenwich Street.

3. WTC Dust - 9/23/05 (Airtek #DL09/23-01) (York ID 05090679-01)

Low sample mass of the above-referenced WTC dust sample collected on 9/23/05 prevented analysis for Total PCBs. This sample was collected from various floors of the 21-23 Thames Street.

4. 9/23/05 (Airtek #DL09/23-03 and -04) (York ID 05090679-03 and -04)

Low sample mass of the above-referenced samples of food containers and paper debris collected on 9/23/05 prevented analysis for Ignitability. This sample was collected from various floors of the 21-23 Thames Street.

5. 9/23/05 (Airtek #DL09/23-07 and -08) (York ID 05090680-03 and -04)

Low sample mass of the above-referenced samples of food containers and paper debris collected on 9/23/05 prevented analysis for Corrosivity, Reactivity and Ignitability. These samples were collected from various floors of the 133-135 Greenwich Street Building.

The principal object of the sampling was to determine the RCRA status of the WTC dust itself. Most of the balance of the waste to be produced from the site would not normally be considered to be regulated waste, as it is predominantly conventional building material. Testing of other materials was conducted to confirm the RCRA status of various categories of materials potentially impacted by WTC dust.

In response to the above-referenced deficiencies, Airtek will do the following:

Deficiencies 1 through 3: Airtek will re-sample the dust from each building. Grab samples will be collected from each floor of each building and composited for analysis. A co-located (duplicate) grab sample for each grab sample above will be collected for compositing and analysis. These samples will be analyzed for Full TCLP, RCRA Characteristics, and Total PCBs.

Deficiencies 4 and 5: Airtek will collect additional food container and paper samples from 21-23 Thames Street for compositing and analysis for Ignitability. Airtek will collect additional food container and paper samples from 133-135 Greenwich Street for compositing and analysis for Ignitability, Reactivity and Corrosivity.

EPA will be notified of the time of the re-sampling. The proposed sampling will be conducted immediately and the results will be transmitted to EPA prior to any site removals. As is stated in the submitted plan, any further sampling or analyses deemed appropriate by EPA will be conducted.

Thank you for your time and consideration,

Benn Lewis

Benn Lewis

Vice President

BL:bl Attachment